

LOWENTHAL & ABRAMS, P.C.
GARY J. BRASCETTA, Esquire
Identification No. 69663
555 City Line Avenue, Suite 500
Bala Cynwyd, PA 19004
(610) 667-7511

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

DESTINY KING and MEREDITH)	
BEYERS)	(The Honorable Malachy E. Mannion)
)	
Plaintiffs,)	
)	Civil Action
v.)	
)	
EAST STROUDSBURG SCHOOL)	
DISTRICT and ADAM GANGAWARE,)	
)	
Defendants.)	Case No. 3:17-cv-01764-MEM

PLAINTIFFS' PRE-TRIAL MEMORANDUM

A. SUMMARY OF FACTS AND CONTENTIONS AS TO LIABILITY

On December 8, 2016, Plaintiff, Destiny King, was being dropped off at school by her mother, Meredith Beyers. On this occasion, Ms. King refused to get out of the car because she did not want to go to school; an argument with her mother ensued. Defendant, Officer Gangaware became aware of the situation and approached Ms. King and her mother. Gangaware ordered Ms. King to get out of the vehicle and she refused to do so. Defendant, Officer Gangaware exercised an unnecessary and excessive use of force when he physically removed and assaulted Ms. King on the premises of the School District without legal justification.

B. LIABILITY

Defendants are 100% liable for the injuries Plaintiff, Destiny King received.

C. DAMAGES

Plaintiff, Destiny King, a minor at the time of the accident had suffered a dislocation of her left hip, fractured her pelvis, and cuts and scratches to her face.

D. WITNESSES

- a. Plaintiff, Destiny King; liability and damages
- b. Plaintiff, Meredith Beyers; liability and damages
- c. Defendant, Adam Gangaware; liability and damages
- d. Dr. Christopher Ferrente, M.D.; damages
- e. Ron H. Traenkle; liability

Plaintiffs reserve the right to call any witnesses listed by Defendants.

E. SUMMARY OF EXPERT TESTIMONY

Dr. Ferrante will testify to the injury and its causal relationship to the incident in question, Plaintiff's current condition and her need for future care and treatment as a result of the injury.

Mr. Traenkle will testify that the Defendant's response was inappropriate and resulted in an escalation of the situation. That Defendant used unwarranted and unnecessary force. That Defendant failed to respond professionally and failed to take control of the situation. Finally that Defendant failed to separate the combatants and safeguard Ms. Beyer and maintain order.

F. PROPOSED EXHIBITS

- 1. Narrative Reports of Dr. Christopher Ferrente, M.D.
- 2. Curriculum Vitae of Dr. Christopher Ferrente, M.D.
- 3. Video deposition testimony of Dr. Christopher Ferrente, M.D.
- 4. Liability report of Ron H. Traenkle
- 5. All medical records
- 6. All parties' responses to discovery
- 7. All parties' deposition transcripts
- 8. Photographs of Injury
- 9. Lien Ledger from DHS

Plaintiffs reserve the right to use any exhibits listed by Defendants

G. DEMAND

Plaintiffs demand \$ 120,000.00. Defendants current offer is \$0.00.

H. ATTACHMENTS

- a. Narrative Report of Dr. Christopher Ferrente, M.D.
- b. Curriculum Vitae of Dr. Christopher Ferrente, M.D.
- c. Liability report of Ron H. Traenkle
- d. Lien Ledger from DHS
- e. Photographs of Injury

Respectfully submitted,
LOWENTHAL & ABRAMS, P.C.

/s/ GARY J. BRASCETTA
By: GARY J. BRASCETTA, Esq.



June 27, 2018

Attorney Jeffrey Parker
Lowenthal & Abrams

RE: KING, DESTINY (22112390)

DOB: 12/22/99

Dear Attorney Parker:

I am writing regarding Destiny King. As you know she is currently an 18-year-old patient born on 12/22/99, who had an injury sustained on 12/08/16 where she was pulled from a vehicle by a policeman who then fell on top and injured her leg. She had a CT and x-ray which showed a dislocation of the left hip with a small avulsion fracture. Her dislocation was reduced and there was a minimally displaced avulsion fracture posteriorly which needed no intervention. We saw her afterwards after referral from Dr. Hoffman and basically just followed her along. We sent her to physical therapy which she really did not participate in, as she did not get along with the therapist, but she did develop better motion and decreased pain. She was actually improving quite a bit. We saw her a total of five times on 1/16, 1/23, 2/27, 4/20 of 2017, and Dr. Hoffman saw her on 1/04/17. She was improving at that time. Her pain level was decreasing her motion was improving and she was progressing well. At this point she presents with some pain, mostly with cold in the hip area. She describes it as being in the groin region and maybe a little bit over the trochanter but deep in that direction. The pain is not debilitating but is uncomfortable. She was working as a cashier but was unable to stand for long periods of time so for that reasonable she lost her job, but other than that she was functioning for short periods of time, but being able to stand for a long period of time that it became a problem.

When I saw her today she was complaining of a pain level of 8/10. She is obese with a BMI in the high 30s. Her ROM of her hip was good. Her right hip had excellent ROM with 20° of internal and 30° of external rotation. The left hip was very close to this, approximately 20 and 30 with pain at either extreme. Her flexion was up to 90°. She was able to extend. Her back exam was benign with really no tenderness anywhere and good ROM of her lumbar spine. Repeated x-rays and the fleck of bone that was previously apparent are no longer there; it was either absorbed or healed down, regardless it's not an issue.

Allentown	1503 N. Cedar Crest Blvd., Allentown, PA 18104	Phillipsburg	222 Red School Lane, Phillipsburg, NJ 08865
	1621 N. Cedar Crest Blvd., Allentown, PA 18104	Hazleton	1097 N. Church St., Hazleton, PA 18202
	1405 N. Cedar Crest Blvd., Allentown, PA 18104	Brodheadsville	Rte 115 & Switzgale Rd., Brodheadsville, PA 18322
Bethlehem	2775 Schoenersville Rd., Bethlehem, PA 18017	E Stroudsburg	505 Independence Rd., East Stroudsburg, PA 18301
	2300 Highland Ave., Bethlehem, PA 18020		511 VNA Rd., East Stroudsburg, PA 18301
	2030 Highland Ave., Bethlehem, PA 18020	Lehighton	239 N. First Street, Lehighton, PA 18235
	2310 Highland Ave., Bethlehem, PA 18020	Pittston	1120 Oak St., Pittston, PA 18640
	3100 Emrick Blvd., Bethlehem, PA 18020	Wind Gap	1411 Jacobsburg Rd., Wind Gap, PA 18091

Hospitals: 1503 N. Cedar Crest Blvd. 2310 Highland Ave. 511 VNA Rd.

June 27, 2018

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RE: KING, DESTINY (22112390)

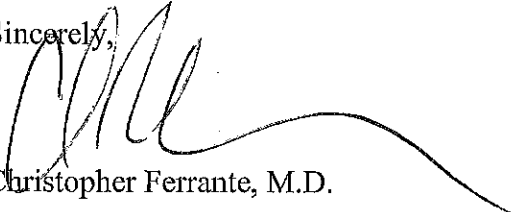
There is no signs of avascular necrosis and no signs of joint space narrowing, i.e. no arthritis currently at this point. I think Ms. King's pain that she is having at this point is probably just cold intolerance and should improve. This usually lasts for about two years after surgery and is getting close. I would like to followup and see her back in March of 2019, which would be a little more than two years, but after the winter to basically see how she tolerates the winter. I told her a little ibuprofen on cold days would probably help her and if she has to stand or work for long periods of time she might be able to tolerate it.

She is likely to develop osteoarthritis of the left hip to a more severe degree in the future as she ages which could possibly result in further treatment such as injections, therapy and possible hip replacement which could potentially cost up to \$100,000.00. At this time, I am hopeful that she will recover.

If you have any questions please do not hesitate to contact me. I am hopeful that she will recover completely from this. If she is not improved in March we might consider MRI at that point to look at soft tissues such as a labral tear, but again I think she basically following the natural course so I don't think we need to get one at this point. I report these findings within a reasonable degree of medical certainty.

Again, if you have any questions please do not hesitate to contact me.

Sincerely,



Christopher Ferrante, M.D.

CF/lmb



October 3, 2018

Attorney Parker

RE: KING, DESTINY (22112390)

DOB: 12/22/99

Dear Attorney Parker:

I am writing you an addendum letter concerning your request for information specified in Rule 26 of the Federal Rules of Civil Procedure. First, I have not authored any publications in the past 10 years and I have not testified as an expert witness within the last four years.

I reviewed the EMS report from December 8, 2016 incident, which indicated that she was unable to move her left leg after the injury and that she was put in in an ambulance by stretcher and taken to the hospital. The EMS report also states that the "left hip, left leg rotated in and shorter than right leg". I was able to review the records from Pocono Medical Center, 110 pages, which support the story that Ms. King gave us and in the consultation by Dr. Scherl, the orthopedic surgeon who did the closed reduction in the emergency room on her. This note was dictated by Michael Rehal, Dr. Scherl's physician assistant. The note goes over the mechanism and such and the physical exam and how the reduction was performed.

These records do not alter the opinions stated in my report dated June 27, 2018. Instead, they provide further support for those opinions. To confirm, the opinions I have expressed in this matter are based on my review of Ms. King's treatment with my office, my review of the medical records pertaining to that treatment and my review of the imaging studies that demonstrated the injuries Ms. King sustained.

In terms of what Ms. King has in store for her in the future, she is at an increased risk of developing osteoarthritis of the left hip, a better chance in the contralateral hip. Again, you asked the cost of future treatment for this and I would expect \$75,000 - \$100,000 is a reasonable estimate of the cost of this phase of care.

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877-247-8080

www.coordinatedhealth.com

610-861-8080

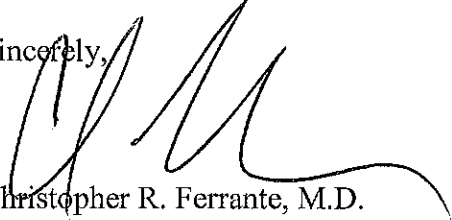
October 3, 2018

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RE: KING, DESTINY (22112390)

If you have any questions, do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to be 'CF', with a long horizontal flourish extending to the right.

Christopher R. Ferrante, M.D.

CF/jm

Christopher R. Ferrante, M.D.

204 Garrison Court
Asbury, NJ 08802

christopherferante@yahoo.com

Biographical:

Born: November 28, 1969
Birthplace: Hackensack, NJ
Citizenship: USA

Private Practice:

April 2015 – Present

COORDINATED HEALTH
222 Red School Lane
Phillipsburg, NJ 08865
(610) 861-8080

3100 Emrick Blvd.
Bethlehem, PA 18020
(610) 861-8080

August 2002 – April 2015

ORTHOPEDIC ASSOCIATES OF THE GREATER LEHIGH VALLEY
Hillcrest Professional Plaza
755 Memorial Parkway, Suite 101
Phillipsburg, NJ 08865
(908) 859-5585

3735 Easton-Nazareth Highway
Suite 101
Easton, PA 18045
(610) 252-1600

Residency:

ORTHOPAEDIC SURGERY RESIDENCY
UNIVERSITY OF MEDICINE AND DENTISTRY OF NEW JERSEY
ROBERT WOOD JOHNSON UNIVERSITY HOSPITAL
DIVISION OF ORTHOPAEDIC SURGERY
New Brunswick, NJ
July 1997-June 2001

MUSCULOSKELETAL ONCOLOGY

MEMORIAL SLOAN-KETTERING CANCER CENTER
New York, NY
January 2000-February 2000

PEDIATRIC ORTHOPAEDIC SURGERY
CHILDREN'S HOSPITAL OF PHILADELPHIA
Philadelphia, PA
November 1998-December 1998

Residency:

GENERAL SURGERY INTERNSHIP
UNIVERSITY OF MEDICINE AND DENTISTRY OF NEW JERSEY
ROBERT WOOD JOHNSON UNIVERSITY HOSPITAL
DEPARTMENT OF GENERAL SURGERY
New Brunswick, NJ
July 1996-June 1997

Fellowship:

HOSPITAL OF THE UNIVERSITY OF PENNSYLVANIA
IMPLANT SERVICE FELLOWSHIP
Philadelphia, PA
August 2001-July 2002

Education:

UNIVERSITY OF MEDICINE AND DENTISTRY OF NEW JERSEY
ROBERT WOOD JOHNSON MEDICAL SCHOOL 1992-1996
Piscataway, NJ
Medical Doctorate, May 1996

THE JOHNS HOPKINS UNIVERSITY 1988-1992
Baltimore, MD
Bachelor of Arts, Biology and Economics, May 1992
University and Departmental Honors

Honors:

Graduate:

Alpha Omega Alpha, Inducted 1995
McGraw-Hill Award, Robert Wood Johnson Medical School, 1993
George F. Smith Scholarship, Foundation of UMDNJ, Full Scholarship,
1992-1996

Undergraduate:

General University Honors, Johns Hopkins, 1992
Departmental Honors in Economics, Johns Hopkins, 1992
The Max Hothschild Award, Johns Hopkins Department of Economics, 1992
Phi Beta Kappa, Inducted 1992

Accepted for Graduate Work in Economics, Johns Hopkins, 1991
Dean's List, 1988-1991 Inclusive
Beneficial Hodson Scholar, 60% Tuition for Johns Hopkins, 1988-1992
National Merit Scholar, 1988-1992

Professional Certification:

American Board of Orthopaedic Surgery Part I: July 2001
USMLE Part I: August 1994
USMLE Part II: September 1995
USMLE Part III: May 1997
New Jersey State License, #MA066773
Pennsylvania State License, #MD417271

Publications:

Gatt CJ, Ferrante C, Parker RD: Pre-emptive Analgesia in Anterior Cruciate Ligament Reconstruction. *Sports Medicine and Arthroscopy Review* 1998;6(3): 190-198

Research:

Pre-emptive Analgesia in Total Knee Arthroplasty

Grand Rounds Presentations:

Femoral Neck Fractures in the Elderly, June 1998
Lateral Ankle Sprains, October 1998
Slipped Capital Femoral Epiphysis, April 1999
Malleolar Fractures, September 1999
Periprosthetic Hip Fractures, March 2000
Periprosthetic Knee Fractures, October 2000
Osteonecrosis of the Hip, January 2001

Report in the Matter of
D.K., a minor, et al.
Vs.
East Stroudsburg School District
and Adam Gangware

Civil Action No. 3:17-CV-01764
U.S. District Court
Middle District of Pennsylvania

Prepared by:

A handwritten signature in black ink, appearing to read "Ronald H. Traenkle", with a large, sweeping flourish at the end.

Ronald H. Traenkle

July 6, 2018

Materials Reviewed

1. Civil Complaint No. 3:17-CV-01764, *D.K., et al. vs. East Stroudsburg School District and Adam Gangware*
2. Deposition Transcript of Adam Gangware; April 9, 2018
3. Deposition Transcript of Richard Fehrle; April 9, 2018
4. Deposition Transcript of Frederick Mills; April 25, 2018
5. Video Deposition Transcript of Meredith Beyers; April 27, 2018
6. Meredith Beyers photo exhibits 1-7 dated April 27, 2018
7. Video Deposition Transcript of Destiny King; April 27, 2018
8. Deposition Transcript of Victor Malvagno; February 13, 2018
9. Monroe County Control Center 911 call relative to this incident
10. Monroe County Control Center Radio Time Log for Incident 160119821
11. Monroe County Control Center call to Pennsylvania State Police
12. Officer Gangware's Training Records relative to TACT2 (Therapeutic Aggression Control Techniques)
13. East Stroudsburg Area School District School Police General Order #006 Use Of Force
14. East Stroudsburg Area School District Police Department Incident Report #20170884 (3 pages)
15. Commonwealth of Pennsylvania Written Allegation relative to this incident (4 pages)
16. Student Demographic Sheet relative to Destiny Courage King
17. Photo of Destiny King
18. Penn DOT Driver's License Information and photo relative to Meredith Beyers
19. Pike County District Attorney's Notice of a Pre-Adjudication Conference for Destiny King relative to this incident
20. Google map of 279 Timberwolf Drive
21. Google map of 279 Timberwolf Drive (as edited by Officer Gangware)
22. East Stroudsburg Area School District Police Department Incident Report #20160788 (3 pages)
23. Student Demographic Sheet relative to Courtney Autumn Lutes
24. Commonwealth of Pennsylvania Written Allegation relative to Incident Report #20160788 (4 pages)
25. Correspondence from Monroe County Probation Department to Pike County Probation Department relative to Incident Report #20160788
26. Commonwealth of Pennsylvania Dispositional Hearing Order relative to Incident Report #20160788
27. East Stroudsburg Area School District Policies Nos. 103,103/104 (attachment) 103.1, 104, 218, 219, 235, 247, 249, 440, 516, and 517
28. East Stroudsburg Area School District Code of Student Conduct 2016-2017

29. Miscellaneous Training Certificates awarded to Officer Gangware for completion of on-line Municipal Police Officers Education and Training Commission courses
30. Therapeutic Aggression Control Techniques-2 training records for Adam Gangware

Summary of the Incident

The following summary of the events of December 8, 2016 is based on the police reports, depositions, and other available documents listed in the preceding section. It is not intended to suggest that such facts are or will be uncontested.

On December 8, 2016, Meredith Beyers and her 17 year old daughter Destiny King both overslept and, as a result, Destiny was unable to catch her school bus. Ms. Beyers elected to drive Destiny to school. Upon arrival at East Stroudsburg High School, Destiny, who has been diagnosed with Oppositional Defiant Disorder, told her mother she did not want to go into school. Ms. Beyers told her to go into school. Destiny refused and asked her mother to drive on. The women began to argue and Ms. Beyers took Destiny's cell phone as punishment. A struggle over the phone ensued. Destiny grabbed her mother's wrist and attempted to wrest the phone from her mother. Ms. Beyers placed several 911 calls but Destiny always managed to disconnect the calls. When Destiny could not get her phone back, she exited the still rolling car and began to walk away from her mother. Ms. Beyers began to slowly follow Destiny and again spoke with police radio.

In response to Ms. Beyers calls, East Stroudsburg Area School District Police Officer Adam Gangware was dispatched to the scene. Ms. Beyers saw Officer Gangware approaching behind her so she activated the flashers on her vehicle, pulled over, and exited her car to speak with the officer. While Ms. Beyers was speaking with the officer, Destiny crossed the street, jumped into the passenger front seat of her mother's car, and locked the doors. Ms. Beyers went to the driver's side while the officer moved to the passenger side. Both adults began to ask Destiny to get out of the car and go to school. Destiny refused to cooperate. Ms. Beyers, while still outside the car, began to use her remote control key fob to unlock the car. However, Destiny would push the passenger side front door lock down to prevent entry. Eventually, Officer Gangware managed to enter the passenger side rear seat. He reached over the seat, grabbed Destiny's right arm then pulled it down and back. From outside the car, Ms. Beyers unlocked the doors and Gangware exited the car. He opened the front passenger door, reached in, and grabbed Destiny's right arm. He began to pull on it to remove her from the car as he shouted, "*You're going to jail*". Destiny resisted by holding onto the vehicles interior. She was crying, calling to her mother, and saying she was scared and did not want to go to jail. A virtual tug of war ensued between Officer Gangware and Destiny. He kept repeating, "*You're going to jail*". Destiny continued crying. Gangware then grabbed Destiny's arm and the front of her sweatshirt, forcefully yanked her from the vehicle and flung her to the ground.

“He (Gangware) threw her ...He took her out and threw her face first onto ground ...and then her feet and legs followed ...her feet never hit the ground until her top half was already on the ground.”

(Beyers' Deposition; April 27, 2018) [Emphasis Added]

Once Destiny was prostrate on the snowy covered ground, Officer Gangware, either intentionally or accidentally came down on top of her and handcuffed her. The officer tried to sit Destiny upright, she was screaming hysterically and complaining of pain in her leg. At the mother's request an ambulance was called and transported Destiny to the hospital.

Officer Gangware's account is quite different. He contends that when he arrived Destiny was walking some 500 feet away. He spoke with Ms. Beyers, who showed him her injuries and described being attacked by Destiny. Gangware alleges he then drove to where Destiny was walking as Ms. Beyers followed behind him. He asserts when he exited his car and approached Destiny, she ran back to her mother's car, jumped in, and locked the doors. Ms. Beyers then allegedly turned off her car and tried to unlock the doors. Officer Gangware claims at this point in time Destiny began striking her mother with her left hand while holding the front door lock down with her right hand. The officer further avers he was *“fearing for the well-being of Beyers”* but inexplicably did nothing to end the alleged assault. Rather he grabbed at the hand Destiny was using to hold the door lock down while Destiny continued to strike her mother with her left hand.

Officer Gangware goes on to report that when Ms. Beyers was able to unlock the passenger front door, he got out of the car, opened the door, and immediately began yanking on Destiny's right arm. Officer Gangware maintains:

“...both K. (Destiny King) and myself lost our footing on the snow-covered grass and fell to the ground. As I placed K. in handcuffs and assisted her into a sitting position K. complained of severe left thigh pain. And I requested an EMS unit.

(Officer Gangware's Deposition; April 9, 2018) [Emphasis Added]

Both sides agree the wait for the ambulance was very long. They also agree that, as a result of this incident, Destiny King suffered a left hip dislocation and a fractured pelvis.

Conclusions and Opinions

Based upon the facts and focal issues in the incident of December 8, 2017 and using the contemporary professional literature on police policies, procedures and practices relevant to this incident and my own training and experience as a frame of reference, I have formed the following opinions. These opinions are accurate within all reasonable limits of professional certainty and reflect the current professional standards taught nationally. They are subject to change based upon the discovery of new information, either before or during trial. I have requested additional documents relative to this case. Therefore, I also reserve the right to supplement or amend this report as the new discovery material becomes available.

- I. Law enforcement officers throughout the United States are taught that their use of force will be judged against the “reasonableness” standards established by the United States Supreme Court in the Graham vs. Connor and Tennessee vs. Garner decisions.

Peace officers in the United States are instructed in both their entry-level training and during their in-service trainings that an apprehension by the use of deadly force is a “seizure” under the Fourth Amendment. [Tennessee vs. Garner, 471 U.S. 4, 7, (1985)] They are also taught that claims a law enforcement officer has used excessive force – deadly or not – in the course of an arrest, investigatory stop or other “seizure” of a free citizen will be analyzed under the Fourth Amendment and its “reasonableness standard”. [Graham vs. Connor, 490 U.S. 386, 395 (1989)]

- II. Use of force training presented to police officers incorporates professional publications, such as the Criminal Law Reporter, to teach the Graham v. Connor standard.

“In this case the U.S. Supreme Court stated that all claims in which law enforcement officers have used excessive force – deadly or not – in the course of an arrest, investigatory stop, or other ‘seizure’ of a free citizen should be analyzed under the Fourth Amendment and its ‘reasonableness’ standard, rather than under a ‘substantive due process’ approach. The right to make an arrest or investigatory stop necessarily carries with it the right to use some degree of physical coercion or threat thereof to effect it. The reasonableness of this force requires careful attention to the facts and circumstances of each particular case, including the severity of the crime at issue, whether the suspect poses an immediate

threat to the safety of the officers and others and whether he is actively resisting or attempting to evade arrest by flight (does the totality of the circumstances justify the actions). The 'reasonableness' of a particular use of force must be judged from the perspective of a reasonable officer on the scene, rather than 20/20 vision of hindsight. This reasonableness must allow for the fact that police officers are often forced to make split-second judgments – in circumstances that are tense, uncertain, and rapidly evolving – about the amount of force that is necessary in a particular situation. The 'reasonableness' inquiry in an excessive force case is an objective one: the question is whether the officer's actions are 'objectively reasonable' in light of the facts and circumstances confronting them, without regard to their underlying intent or motivation. The evil intentions of an officer will not make a Fourth Amendment violation out of an objectively reasonable use of force nor will good intentions make an objectively unreasonable use of force constitutional."

- III. Contemporary professional literature, practice, and training are structured so as to teach police personnel to conform to the current "state of law". In order for an officer to be in compliance, police officers are taught in both their entry-level training and during their in-service trainings that the force they use should be progressive in nature and, where practical, advance through an escalating series of steps.

The utopian and theoretical progression of force may be depicted graphically, such as by using the Confrontational Force Continuum[®] included in this report. It depicts an idyllic use of force by employing a linear acceleration through a progressive series of steps.

- I. Officer Presence
- II. Verbal Command
- III. Open Hand
- IV. Pain Compliance
- V. Mechanical Compliance
- VI. Impact
- VII. Deadly Force

- IV. While the Force Continuum may take various forms (graphs, wheels, ladders, etc.) and use different verbiage, they are fundamentally alike and are used as a visual training tool to assist officers in their decision-making. Force Continuums, such as the one in this report, include a section referred to as "Officer Subject Factors". Among the officer subject factors to be found in the East Stroudsburg Area School District School Police General Order #006 Use of Force are: age, sex, size, skill training, strength, and endurance. **Officer Gangware held the advantage in all of these critical areas.**
- V. In determining the propriety of Officer Gangware's decision to use force on December 8, 2016, his conduct "must be judged from the perspective of a reasonable officer on the scene". Only his knowledge of the facts and circumstances immediately prior to, and at the moment he made the decision to employ force, are relevant.
- A. It is in dispute as to whether Officer Gangware actually observed any physical confrontation between Meredith Beyers and Destiny King. If he did, he observed a violation of the Pennsylvania Consolidated Statutes Title 18; Crimes and Offenses § 2701, Simple Assault.

It is my opinion to an extremely high degree of professional certainty that in the event the officer did not witness an assault, (as both Ms. Beyers and Ms. King avow) **Officer Gangware's laying hands on the 17 year old Ms. King was unwarranted and unlawful. Such use of force would be a gross violation of the generally accepted professional standard, inconsistent with the professional training taught nationally, and outside the parameters of professional conduct to which a properly administered agency holds its members.**

- B. In the event Officer Gangware did witness Ms. King striking her mother while he was seated in the rear passenger seat of the car, **he would have been justified in the use of reasonable force to protect Ms. Beyers.** He, in fact, reported that he feared for the "well-being" of Ms. Beyers. However, **Officer Gangware took no action to defend or protect her.** By his account, Officer Gangware allowed Ms. King to repeatedly strike her mother while he attempted to pull Destiny's hand from the door lock.

It is my opinion to an extremely high degree of professional certainty that, **by the officer's own account Gangware's actions were inconsistent with the professional training taught nationally and outside the parameters of conduct to which a properly administered agency holds its members.**

Had Officer Gangware made the correct decision and protected Ms. Beyers, he should have taken control of Ms. King's arms and directed Beyers to get out of the car. With Ms. Beyers now safe from harm the officer could begin efforts to defuse the situation. Time was not a factor. He and Ms. Beyers could calmly speak with Destiny in such a way that violence was averted, Destiny ends her emotional outburst, and she regains a sense of calm and self-control.

- C. In Officer Gangware's version of the incident he asserts that when Ms. Beyers was able to unlock the passenger front door, **he got out of the car, opened the door and immediately began yanking on Destiny's right arm.** (According to Ms. Beyers and Ms. King, he was screaming "*You're going to jail*". The officer asserts he was repeatedly stating "*You're under arrest.*")

It is my opinion to an extremely high degree of professional certainty that **once the passenger door was open and Ms. Beyers was safe, there was no urgency to extricate Ms. King from the car and no need for the use of any physical force.** It is the goal of a law enforcement officer at the verbal level to obtain voluntary compliance. Verbal Judo or Tactical Communications is the art of persuasion that redirects the subject's behavior with words and generates voluntary compliance.

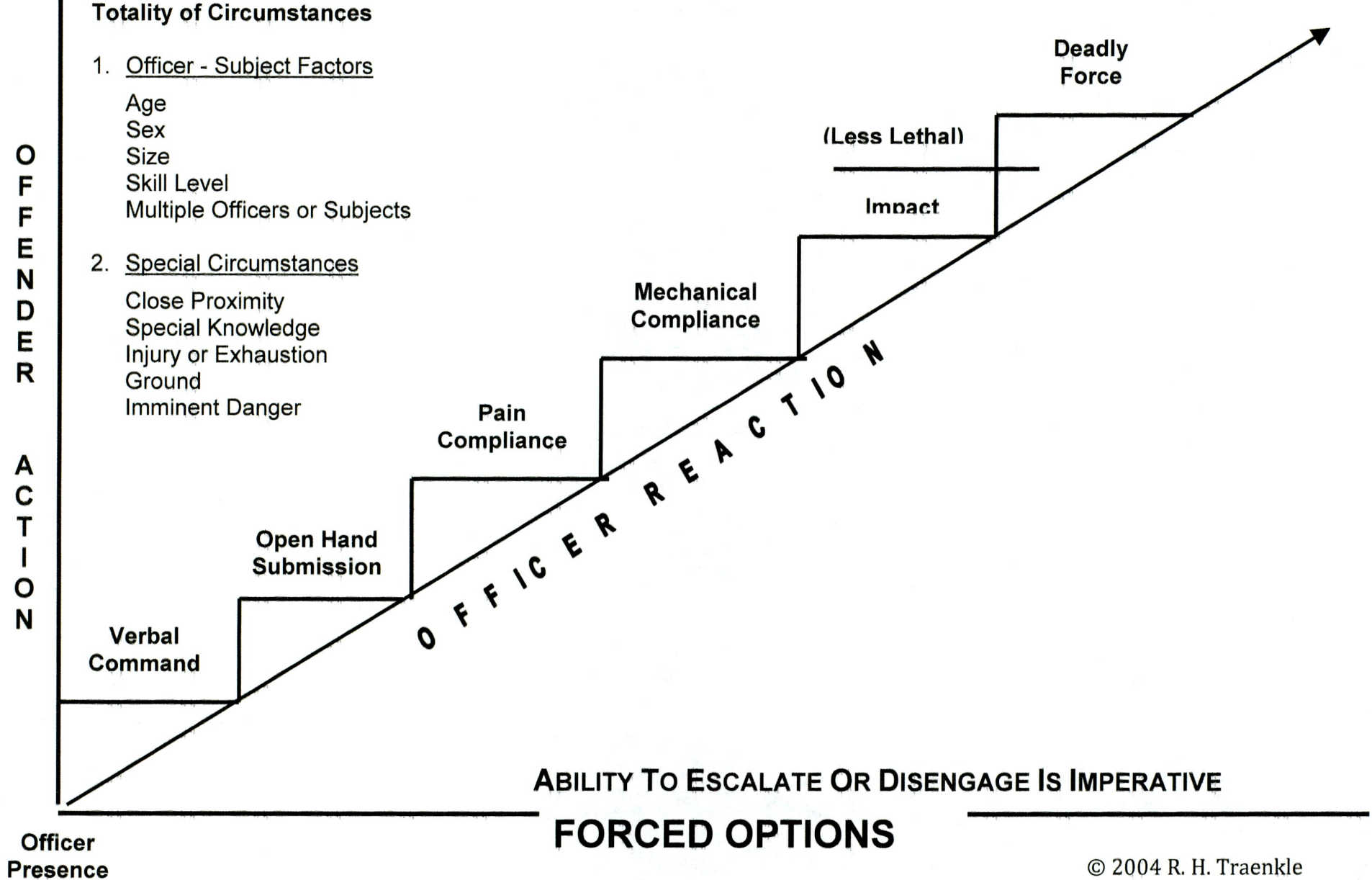
However, Officer Gangware **worsened the situation by escalating his physical actions.** He initiated a tug of war with Ms. King's arm as the prize rather than staying calm, using verbal persuasion, and allowing the situation to deescalate.

It is further my opinion to an extremely high degree of professional certainty that **Officer Gangware's decision to forcefully and violently remove Destiny King from her mother's vehicle was unwarranted, unnecessary, contrary to the generally accepted professional standard, inconsistent with the professional training taught nationally, and outside the parameters of professional conduct to which a properly administered agency holds its members.**

- VI. Law enforcement officers in the Commonwealth of Pennsylvania and throughout the United States are taught that upon their arrival at the scene of an incident, they are to take control. Their priorities are to separate combatants, ensure the safety of all persons present, maintain order, investigate the incident, and determine the best course of action.

Even accepting Officer Gangware's version of the facts, it is my opinion to an extremely high degree of professional certainty that on December 8, 2016 **Officer Gangware failed to professionally respond to Ms. Beyers' request for assistance. He failed to take control of the situation. He failed to ensure the separation of the combatants. He failed to safeguard Ms. Beyers, and he failed to maintain order.** His decision to escalate his level of force from holding Destiny King to violently yanking her out of her mother's vehicle while he was standing on slippery snow covered ground was the precipitating event that resulted in the serious and painful injuries she suffered.

CONFRONTATIONAL FORCE CONTINUUM



COMMONWEALTH OF PENNSYLVANIA
BUREAU OF PROGRAM INTEGRITY
DIVISION OF THIRD PARTY LIABILITY
RECOVERY SECTION
PO BOX 8486
HARRISBURG, PA 17105-8486

July 13, 2017

STATEMENT OF CLAIM SUMMARY

NAME	KING, DESTINY
ID	600 149 696

MEDICAL	USUAL CHARGES	AMT APPROVED
CLAIMS	15,759.90	1,757.32

CASH	PERIOD COVERED	DOLLAR AMOUNT
CURRENT SOC	—	.00

REIMBURSEMENT TO DPW	1,757.32
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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF PUBLIC WELFARE EIN - 23-6003113
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

FERRANTE CHRISTOPHER R
3735 EASTON NAZARETH HWY
STE 101
EASTON PA 18045

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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04/20/17 - 04/20/17 05/22/17 206991041300001 206991041300001 110.00 71.50

DIAGNOSIS 1: S73015D

POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER

DIAGNOSIS 2 M25552

PAIN IN LEFT HIP

PROC CODE : 99213 OFFICE/OUTPATIENT VISIT EST

PROVIDER SUB TOTAL	FERRANTE CHRISTOPHER R 100946057 0001 NPI :	110.00	71.50
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

CH HOSPITAL OF ALLENTOWN LLC
1503 N CEDAR CREST BLVD

ALLENTOWN PA 18104

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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04/20/17 - 04/20/17 05/22/17 206991632300001 206991632300001 360.01 25.88

DIAGNOSIS 1: M25552

PAIN IN LEFT HIP

DIAGNOSIS 2 S73015D

POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER

PROC CODE : 72100 X-RAY EXAM L-S SPINE 2/3 VWS

PROVIDER SUB TOTAL	CH HOSPITAL OF ALLENTOWN LLC 102374924 0001 NPI :	360.01	25.88
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

POCONO HOSPITAL

206 E BROWN ST

EAST STROUDSBURG PA 18301

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
12/08/16 - 12/08/16	00/00/00	R20648782520001-0301	22170342854520001	61.47	2.40
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
NDC CODE : 63323026937 DIPRIVAN 200 MG/20 ML VIAL - ANESTHETICS GEN INJECT					
12/08/16 - 12/08/16	00/00/00	R20659846870001-0701	22170725114050001	61.47	2.40
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
NDC CODE : 63323026937 DIPRIVAN 200 MG/20 ML VIAL - ANESTHETICS GEN INJECT					
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0401	32170547720600001	476.55	16.41
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE : 73501 X-ray exam hip uni 1 view					
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0402	32170547720600002	723.55	24.60
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE : 73502 X-ray exam hip uni 2-3 views					
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0403	32170547720600003	482.37	18.76
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE : 73552 X-ray exam of femur 2/>					
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0404	32170547720600004	728.97	24.66
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE : 73564 X-RAY EXAM KNEE 4 OR MORE					

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

POCONO HOSPITAL
206 E BROWN ST

EAST STROUDSBURG PA 18301

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0405	32170547720600005	2,052.05	86.94
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE: 73700 COMPUTERIZED AXIAL TOMOGRAPHY, LOWER EXT					
12/08/16 - 12/08/16	02/13/17	Z20659846870001-0406	32170547720600006	725.65	135.30
DIAGNOSIS 1: S73005A UNSPECIFIED DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 S32402A UNSPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE					
PROC CODE: 99284 EMERGENCY DEPARTMENT VISIT FOR THE EVALU					
12/16/16 - 12/16/16	01/16/17	Z20651415980001-0401	32170547490920001	723.55	24.60
DIAGNOSIS 1: S72092D OTHER FRACTURE OF HEAD AND NECK OF LEFT FEMUR, SUBSEQUENT ENCOUNTER FOR CLOSED FRACTURE WITH ROUTINE HEALING					
PROC CODE: 73502 X-ray exam hip uni 2-3 views					
12/23/16 - 12/23/16	01/23/17	Z20653334530001-0401	32170547557690001	3,420.55	295.90
DIAGNOSIS 1: S3993XA UNSPECIFIED INJURY OF PELVIS, INITIAL ENCOUNTER					
DIAGNOSIS 2 M7989 OTHER SPECIFIED SOFT TISSUE DISORDERS					
PROC CODE: 73721 MRI JNT OF LWR EXTRE W/O DYE					
12/30/16 - 12/30/16	01/30/17	Z20655703310001-0401	32170547573560001	723.55	24.60
DIAGNOSIS 1: S32492D OTHER SPECIFIED FRACTURE OF LEFT ACETABULUM, SUBSEQUENT ENCOUNTER FOR FRACTURE WITH ROUTINE HEALING					
PROC CODE: 73502 X-ray exam hip uni 2-3 views					
PROVIDER SUB TOTAL	POCONO HOSPITAL 01 100772397 0001 NPI :			10,179.73	656.57

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

CH HOSPITAL OF ALLENTOWN LLC
1503 N CEDAR CREST BLVD

ALLENTOWN PA 18104

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
01/04/17 - 01/04/17	02/06/17	Z20658280630001-0401	32170547514860001	208.57	62.39
DIAGNOSIS 1: S73015A POSTERIOR DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 R202 PARESTHESIA OF SKIN					
PROC CODE: 99203 OFFICE/OUTPATIENT VISIT NEW					
01/13/17 - 01/13/17	02/27/17	Z20664671070001-0701	32170812621350001	458.19	28.91
DIAGNOSIS 1: S73015A POSTERIOR DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER					
DIAGNOSIS 2 R202 PARESTHESIA OF SKIN					
PROC CODE: 97110 THERAPEUTIC PROCEDURE, ONE OR MORE AREAS					
01/16/17 - 01/16/17	02/15/17	Z20662127050001-0401	32170547703150001	180.01	40.25
DIAGNOSIS 1: S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER					
DIAGNOSIS 2 M25552 PAIN IN LEFT HIP					
PROC CODE: 99213 OFFICE/OUTPATIENT VISIT EST					
01/23/17 - 01/23/17	02/20/17	Z20663369030001-0701	32170812632860001	180.01	40.25
DIAGNOSIS 1: M25552 PAIN IN LEFT HIP					
DIAGNOSIS 2 S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER					
PROC CODE: 99213 OFFICE/OUTPATIENT VISIT EST					
02/27/17 - 02/27/17	03/22/17	Z20676210100001-1001	32171070339470001	331.50	25.71
DIAGNOSIS 1: S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER					
DIAGNOSIS 2 M25552 PAIN IN LEFT HIP					
PROC CODE: 73502 X-ray exam hip uni 2-3 views					

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

CH HOSPITAL OF ALLENTOWN LLC
1503 N CEDAR CREST BLVD

ALLENTOWN PA 18104

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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02/27/17 - 02/27/17 03/22/17 Z20676210100001-1002 32171070339470002 180.01 40.25

DIAGNOSIS 1: S73015D

POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER

DIAGNOSIS 2 M25552

PAIN IN LEFT HIP

PROC CODE : 99213 OFFICE/OUTPATIENT VISIT EST

PROVIDER SUB TOTAL	CH HOSPITAL OF ALLENTOWN LLC 01 102374924 0002 NPI :	1,538.29	237.76
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

AMERIHEALTH CARITAS NORTHEAST
1901 MARKET ST

PHILADELPHIA PA 19103

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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12/08/16 - 12/08/16 01/18/17 Z20650002600001-0401 32170540493800001 1,318.00 50.00

DIAGNOSIS 1: S32422A

DISPLACED FRACTURE OF POSTERIOR WALL OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE

PROC CODE : 99285 EMERGENCY DEPARTMENT VISIT FOR THE EVALU

PROVIDER SUB TOTAL	AMERIHEALTH CARITAS NORTHEAST 07 100933907 0005 NPI : 1497784623	1,318.00	50.00
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

CHS PROFESSIONAL PRACTICE PC
2775 SCHOENERSVILLE RD

BETHLEHEM PA 18017

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
01/04/17 - 01/04/17	02/20/17	Z20658088450101-0701	32170812522800001	130.00	105.96
DIAGNOSIS 1: S73015A POSTERIOR DISLOCATION OF LEFT HIP, INITIAL ENCOUNTER PROC CODE: 99203 OFFICE/OUTPATIENT VISIT NEW					
01/16/17 - 01/16/17	02/20/17	Z20662102640101-0701	32170812278760001	110.00	71.50
DIAGNOSIS 1: S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER PROC CODE: 99213 OFFICE/OUTPATIENT VISIT EST					
01/23/17 - 01/23/17	02/20/17	Z20663392240001-0701	32170812322320001	110.00	71.50
DIAGNOSIS 1: M25552 PAIN IN LEFT HIP PROC CODE: 99213 OFFICE/OUTPATIENT VISIT EST					
02/27/17 - 02/27/17	03/22/17	Z20676620070001-1001	32171071407060001	110.00	71.50
DIAGNOSIS 1: S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER PROC CODE: 99213 OFFICE/OUTPATIENT VISIT EST					
02/27/17 - 02/27/17	03/22/17	Z20676620070001-1002	32171071407060002	94.00	28.49
DIAGNOSIS 1: S73015D POSTERIOR DISLOCATION OF LEFT HIP, SUBSEQUENT ENCOUNTER PROC CODE: 73502 X-ray exam hip uni 2-3 views					
PROVIDER SUB TOTAL	CHS PROFESSIONAL PRACTICE PC 17 001715070 0050 NPI: 1013904416			554.00	348.95

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

CVS PHARMACY 02002

239 FOX RUN LN

EAST STROUDSBURG PA 18302

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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12/08/16 - 12/08/16	00/00/00	A516743232085101	35163634818770001	13.29	3.43
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DIAGNOSIS 1 :

NDC CODE : 00093005805 TRAMADOL HCL 50 MG TABLET - NARCOTIC ANALGESICS

12/16/16 - 12/16/16	00/00/00	A816751360475101	35170103472050001	19.59	5.65
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DIAGNOSIS 1 :

NDC CODE : 42858010201 OXYCODONE-ACETAMINOPHEN 5-325 - NARCOTIC ANALGESICS

01/16/17 - 01/16/17	00/00/00	A717416849307101	35170458476330001	25.99	9.53
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DIAGNOSIS 1 :

NDC CODE : 65162019050 NAPROXEN 500 MG TABLET - ANTIARTHRITICS

PROVIDER SUB TOTAL	CVS PHARMACY 02002 24 101553887 0436 NPI :	58.87	18.61
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

HEMLOCK FARMS VOLUNTEER FIRE AND RESCUE
1053 HEMLOCK FARMS

HAWLEY PA 18428

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
12/08/16 - 12/08/16	04/03/17	Z20679563950001-1301	32171367451170001	850.00	120.00
DIAGNOSIS 1: T1490					
INJURY, UNSPECIFIED					
PROC CODE : A0429 AMBULANCE SVC,BASIC LIFE SUP,EMERGENCY T					

PROVIDER SUB TOTAL	HEMLOCK FARMS VOLUNTEER FIRE AND RESCUE COM 26 001584254 0001 NPI : 1508825977	850.00	120.00
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

MEDICAL IMAGING OF LEHIGH VALLEY PC
1200 S CEDAR CREST BLVD

ALLENTOWN PA 18103

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
12/08/16 - 12/08/16	01/23/17	Z20651071260001-0401	32170540679740001	40.00	7.57
DIAGNOSIS 1: M79652 PAIN IN LEFT THIGH PROC CODE: 73552 X-ray exam of femur 2/>					
12/08/16 - 12/08/16	01/23/17	Z20651071260001-0402	32170540679740002	40.00	10.03
DIAGNOSIS 1: M79652 PAIN IN LEFT THIGH PROC CODE: 73564 X-RAY EXAM KNEE 4 OR MORE					
12/08/16 - 12/08/16	01/23/17	Z20651071260001-0403	32170540679740003	185.00	50.59
DIAGNOSIS 1: M79652 PAIN IN LEFT THIGH PROC CODE: 73700 COMPUTERIZED AXIAL TOMOGRAPHY, LOWER EXT					
12/08/16 - 12/08/16	01/23/17	Z20651071260001-0404	32170540679740004	27.00	7.57
DIAGNOSIS 1: M79652 PAIN IN LEFT THIGH PROC CODE: 73501 X-ray exam hip uni 1 view					
12/16/16 - 12/16/16	01/18/17	Z20651936420001-0401	32170540597450001	32.00	8.98
DIAGNOSIS 1: S32492A OTHER SPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE PROC CODE: 73502 X-ray exam hip uni 2-3 views					
12/23/16 - 12/23/16	01/25/17	Z20654284970001-0401	32170540682320001	285.00	71.75
DIAGNOSIS 1: Z043 ENCOUNTER FOR EXAMINATION AND OBSERVATION FOLLOWING OTHER ACCIDENT PROC CODE: 73721 MRI JNT OF LWR EXTRE W/O DYE					
12/30/16 - 12/30/16	02/01/17	Z20656830040001-0401	32170547004450001	32.00	8.98
DIAGNOSIS 1: S32492A OTHER SPECIFIED FRACTURE OF LEFT ACETABULUM, INITIAL ENCOUNTER FOR CLOSED FRACTURE PROC CODE: 73502 X-ray exam hip uni 2-3 views					
PROVIDER SUB TOTAL	MEDICAL IMAGING OF LEHIGH VALLEY PC 31 000629610 0006 NPI : 1215086962			641.00	165.47

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

July 13, 2017

STATEMENT OF CLAIM

NAME	KING, DESTINY
ID	600 149 696

SIBBERING & MIELNICKI ASSOC PC
5221 MILFORD RD

EAST STROUDSBURG PA 18302

DATE OF SERVICE	PAYMENT DATE	ORIGINAL CRN	ADJUSTED CRN	USUAL CHARGES	AMOUNT APPROVED
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01/04/17 - 01/04/17 01/30/17 Z20655157080001-0401 32170540765070001 150.00 62.58

DIAGNOSIS 1: M25552

PAIN IN LEFT HIP

PROC CODE : 99214 OFFICE/OUTPATIENT VISIT EST

PROVIDER SUB TOTAL	SIBBERING & MIELNICKI ASSOC PC 31 001672052 0001 NPI : 1083791180	150.00	62.58
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DATE : 07/13/2017

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF PUBLIC WELFARE

PAYMENT NOTICE BREAKDOWN

NAME	KING, DESTINY
ID	600 149 696

USUAL CHARGE		15,759.90
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MEDICAL	FEE FOR SERV	ENCOUNTER	REDUCTION	TOTAL
INPATIENT	.00	.00	.00	.00
OUTPATIENT	.00	1,757.32	.00	1,757.32
LONG TERM CARE	.00	.00	.00	.00
TOTAL	.00	1,757.32	.00	1,757.32

CASH	AMOUNT		REDUCTION	TOTAL
-	.00		.00	.00

GRAND TOTAL		1,757.32
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